

PILLSBURY WINTHROP SHAW PITTMAN LLP  
JOHN M. GRENFELL (CA Bar No. 88500)  
john.grenfell@pillsburylaw.com  
JACOB R. SORENSEN (CA Bar No. 209134)  
jake.sorensen@pillsburylaw.com  
FUSAE NARA (pro hac vice)  
fusae.nara@pillsburylaw.com  
ANDREW D. LANPHERE (CA Bar No. 191479)  
andrew.lanphere@pillsburylaw.com  
50 Fremont Street  
San Francisco, CA 94105  
Telephone: (415) 983-1000  
Facsimile: (415) 983-1200

Attorneys for Defendants  
SHARP CORPORATION and  
SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI  
MDL No. 1827

This Document Relates To:  
ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING PRETRIAL  
SCHEDULE FOR “TRACK ONE”  
DIRECT ACTION PLAINTIFF AND  
STATE ATTORNEY GENERAL  
CASES**

The Direct Action Plaintiffs, Attorneys General, and Defendants party to the below-listed actions (collectively, “Parties”) hereby stipulate as follows:

**STIPULATION**

WHEREAS the Parties have met and conferred regarding the schedule set in the Court’s Order re: Pretrial and Trial Schedule (Dkt. 2165) (“Pretrial and Trial Schedule”);

WHEREAS the Parties agree to the extension of selected dates set in the Pretrial and Trial Schedule in order to allow sufficient time for discovery and related work;

1 WHEREAS the agreed upon revised pretrial schedule does not alter the dates set by  
2 the Court for the last day for hearing dispositive motions, pretrial schedule, or trial(s);

3 NOW, THEREFORE, the Parties, through their undersigned respective counsel,  
4 stipulate and request that the Court order as follows:

5 That the pretrial dates set forth in the Pretrial and Trial Schedule are amended,  
6 solely as to the following cases:

- 7 • *ATS Claim, LLC v. Epson Electronics America, Inc., et al.*, Case No. 09-cv-1115
- 8 • *AT&T Mobility LLC, et al. v. AU Optronics Corporation, et al.*,  
9 Case No. 09-cv-4997
- 10 • *Best Buy Co., Inc., et al. v. AU Optronics Corporation, et al.*,  
11 Case No. 10-cv-4572
- 12 • *Costco Wholesale Corporation v. AU Optronics Corporation, et al.*,  
13 Case No. 11-cv-0058
- 14 • *Dell Inc., et al. v. Sharp Corporation, et al.*, Case No. 10-cv-1064
- 15 • *Eastman Kodak Co. v. Epson Imaging Devices Corp., et al.*,  
16 Case No. 10-cv-5452
- 17 • *Electrograph Systems, Inc., et al. v. Epson Imaging Devices Corp., et al.*,  
18 Case No. 10-cv-0117<sup>1</sup>
- 19 • *Motorola, Inc. v. AU Optronics Corporation, et al.*, Case No. 09-cv-5840
- 20 • *Nokia Corporation, et al. v. AU Optronics Corporation, et al.*,  
21 Case No. 09-cv-5609
- 22 • *Target Corporation, et al. v. AU Optronics Corporation, et al.*,  
23 Case No. 10-cv-4945
- 24 • *TracFone Wireless, Inc. v. AU Optronics Corporation, et al.*,  
25 Case No. 10-cv-3205

---

27 <sup>1</sup> This does not include the separate case, *Electrograph Systems, Inc., et al. v. NEC*  
28 *Corporation, et al.*, Case No. 11-01690 (E.D.N.Y.).

- *State of Missouri, et al. v. AU Optronics Corporation, et al.*,  
Case No. 10-cv-3619
- *State of Florida v. AU Optronics Corporation, et al.*, Case No. 10-cv-3517
- *State of New York v. AU Optronics Corporation, et al.*, Case No. 11-cv-0711
- *State of Oregon v. AU Optronics Corporation, et al.*, Case No. 10-cv-4346

That the pretrial dates set forth in the Order re: Pretrial and Trial Schedule are amended as follows:

Event	Dates Applicable to all Direct Action Plaintiffs and all State AG Plaintiffs (in cases on file by 12/1/10). per Pretrial and Trial Schedule, Dkt. 2165	[Proposed] Revised Dates
Disclosure of identities of plaintiffs' experts and one paragraph description of issues to be addressed by each expert	July 1, 2011	October 3, 2011
Disclosure of identities of all defendants' experts and one paragraph description of issues to be addressed by each expert	August 1, 2011	November 3, 2011
Plaintiffs and defendants each to provide one paragraph description of each issue/ subject of summary judgment motions (copies to be provided to the court)	January 27, 2012	March 1, 2012
Close of limited fact discovery unique to DAP and State AG cases	September 2, 2011	December 8, 2011
Service of opening expert reports for plaintiffs	September 9, 2011	December 15, 2011
Service of underlying data and code	September 12, 2011	December 19, 2011

<b>Event</b>	<b>Dates Applicable to all Direct Action Plaintiffs and all State AG Plaintiffs (in cases on file by 12/1/10). per Pretrial and Trial Schedule, Dkt. 2165</b>	<b>[Proposed] Revised Dates</b>
Parties to serve supplemental disclosure with one paragraph description of any additional issues/topics of summary judgment motions (copies to be provided to the court)	March 2, 2012	April 2, 2012
Service of opposition expert reports	November 8, 2011	February 20, 2012
Service of underlying data and code	November 11, 2011	March 1, 2012
Service of reply expert reports	January 9, 2012	April 27, 2012
Service of underlying data and code	January 12, 2012	April 30, 2012
Last day to file dispositive motions	May 18, 2012	May 25, 2012
Close of expert discovery	February 15, 2012	May 18, 2012
Last day to file oppositions to dispositive motions	June 15, 2012	June 22, 2012
Last day to file reply briefs in support of dispositive motions	July 13, 2012	July 20, 2012
Last day for hearing dispositive motions	August 15, 2012	August 15, 2012
Pretrial conference	October 9, 2012	October 9, 2012
Trial begins	November 5, 2012	November 5, 2012

PROVIDED THAT, the Parties reserve their right to seek further adjustments to the schedule of any specific case based on future developments upon good cause shown in that particular case. Further, the foregoing is without prejudice of the right of any Defendants and intervenors who have opposed a motion filed in any of the above-referenced actions for leave to amend the complaint to add new defendants and/or causes of action to seek further

1 extensions as appropriate in each case if such a motion is granted by the Court. Further,  
2 Defendants and intervenors continue to maintain their oppositions to any such motions  
3 pending before the Court.

4  
5 Dated: July 8, 2011.

6 PILLSBURY WINTHROP SHAW PITTMAN LLP  
7 JOHN M. GRENFELL  
8 JACOB R. SORENSEN  
9 FUSAE NARA  
10 ANDREW D. LANPHERE  
50 Fremont Street  
San Francisco, CA 94105

11 By: /s/ Jacob R. Sorensen  
12 Jacob R. Sorensen

13 Attorneys for Defendants SHARP  
14 CORPORATION and SHARP ELECTRONICS  
CORPORATION

15 With the approval of counsel for AU Optronics  
16 Corporation; AU Optronics Corporation America; Chi  
17 Mei Corporation; Chi Mei Optoelectronics USA, Inc.;  
18 Chimei Innolux Corporation (f/k/a Chi Mei  
Optoelectronics Corp.); CMO Japan Co., Ltd.;  
19 Chunghwa Picture Tubes, Ltd.; Epson Electronics  
America, Inc.; Epson Imaging Devices Corporation;  
20 HannStar Display Corporation; Hitachi, Ltd.; Hitachi  
Displays, Ltd.; Hitachi Electronic Devices (USA), Inc.;  
21 LG Display Co., Ltd.; LG Display America, Inc.;  
Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.;  
22 Philips Electronics North America Corporation;  
Samsung Electronics, Co., Ltd.; Samsung Electronics  
America, Inc.; Samsung Semiconductor, Inc.; Samsung  
23 SDI America, Inc.; Samsung SDI Co., Ltd.; Seiko  
Epson Corporation; Tatung Company of America, Inc.;  
24 Tatung Company; Toshiba Corporation; Toshiba  
Mobile Display Co., Ltd.; Toshiba America Electronic  
25 Components, Inc.; Toshiba America Information  
26 Systems, Inc.

1 CROWELL & MORING LLP  
2 Jerome A. Murphy (*pro hac vice*)  
3 1001 Pennsylvania Avenue, N.W.  
4 Washington, DC 20004-2595  
5 Tel: (202) 624-2985  
6 Fax: (202) 628-5116

7 By: /s/ Jerome A. Murphy  
8 Jerome A. Murphy

9 *Liaison Counsel for Direct Action Plaintiffs, on*  
10 *behalf of the Direct Action Plaintiffs in the matters*  
11 *listed above*

12 CHRIS KOSTER  
13 ATTORNEY GENERAL OF MISSOURI  
14 ANNE E. SCHNEIDER (*pro hac vice*)  
15 ANDREW M. HARTNETT (*pro hac vice*)  
16 P.O. Box 899  
17 Jefferson City, MO 65102  
18 Phone: (573) 751-3321  
19 Fax: (573) 751-2041

20 By /s/ Anne E. Schneider  
21 Anne E. Schneider

22 *Co-Liaison Counsel for Attorneys General*

23 OFFICE OF THE ATTORNEY GENERAL OF  
24 FLORIDA  
25 NICHOLAS J. WEILHAMMER (*pro hac vice*)  
26 PL-0 1, The Capitol  
27 Tallahassee, FL 32399-1050  
28 Phone: (850) 414-3300  
Fax: (850) 488-9134

By /s/ Nicholas J. Weilhammer  
Nicholas J. Weilhammer

*Co-Liaison Counsel for Attorneys General*

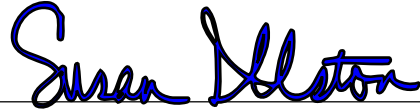
26 ATTESTATION: Pursuant to General Order 45, Part X-B, the filer attests that concurrence  
27 in the filing of this document has been obtained from the above-named parties.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

July 12, 2011



---

The Honorable Susan Illston  
District Court Judge